

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CRIMINAL No. 04-10384-PBS

UNITED STATES

v.

DANIEL KAMEN

**DEFENDANT'S MOTION TO ENLARGE TIME
TO MARCH 12, 2007 TO RESPOND TO
MOTION TO RECONSIDER**

Daniel Kamen, defendant in the above-captioned criminal case, hereby moves the Court for leave to respond by March 12, 2007 to the government's motion to reconsider the Court's Order granting the defendant a new trial. In support of this motion, the defendant states:

1. On January 19, 2007, the Court granted the defendant's new trial motion. On February 16, the government submitted a 16 page motion and memorandum seeking reconsideration of the Court's Order. Counsel requires some additional time to respond because he will be out-of-town from February 25 until March 4.

Respectfully submitted,
DANIEL KAMEN
By his attorneys,

/s/ Charles W. Rankin
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on February 23, 2007.

/s/ Charles W. Rankin
Charles W. Rankin